

State of California  
AIR RESOURCES BOARD

**2017 CLIMATE CHANGE SCOPING PLAN UPDATE**

Resolution 17-46

December 14, 2017

Agenda Item No.: 17-12-1

WHEREAS, sections 39600 and 39601 of the Health and Safety Code authorize the California Air Resources Board (CARB or Board) to adopt standards, rules and regulations and to do such acts as may be necessary for the proper execution of the powers and duties granted to and imposed upon the Board by law;

WHEREAS, the Legislature enacted the California Global Warming Solutions Act of 2006 (AB 32, Statutes of 2006, Chapter 488; Health and Safety Code section 38500 et seq.), which declares global warming poses a serious threat to the economic well-being, public health, natural resources, and environment of California;

WHEREAS, AB 32 charges CARB with monitoring and regulating sources of emissions of greenhouse gases that cause global warming in order to reduce emissions of greenhouse gases (Health and Safety Code section 38510);

WHEREAS, AB 32 directed CARB to create a comprehensive multi-year program to reduce California's greenhouse gas (GHG) emissions to no greater than 1990 levels by 2020, maintain and continue reductions in emissions of GHGs beyond 2020, and initiate the transformations required to achieve the AB 32's long-range climate objectives;

WHEREAS, Health and Safety Code section 38561(a) required CARB to prepare and approve a "scoping plan" for achieving the maximum technologically feasible and cost effective GHG emission reductions by 2020;

WHEREAS, Health and Safety Code section 38652(b) of the Health and Safety Code requires CARB, in adopting greenhouse gas regulations, to the extent feasible and in furtherance of achieving the statewide greenhouse gas emissions limit, to design the regulations in a manner that is equitable and seeks to minimize costs and maximize the total benefits to California; ensure that activities taken to comply with the regulations do not disproportionately impact low-income communities; ensure that activities undertaken pursuant to the regulations complement efforts to achieve and maintain ambient air quality standards and to reduce toxic air contaminant emissions; consider the cost-effectiveness of the regulations; consider overall societal benefits; minimize administrative burden; and minimize leakage;

WHEREAS, CARB prepared and approved the first AB 32 climate change scoping plan (initial Scoping Plan) in 2008 and reapproved it in 2011;

WHEREAS, the initial Scoping Plan contains a mix of recommended strategies that combine direct regulations, market-based approaches, voluntary measures, policies, and other emission reduction programs calculated to limit California's GHG emissions to no greater than the 2020 statewide GHG emission limit and initiate the transformations needed to achieve AB 32's long-range climate objectives;

WHEREAS, Health and Safety Code section 38561(h) requires CARB to update the State's scoping plan for achieving the maximum technologically feasible and cost effective reductions of GHG emissions at least once every five years;

WHEREAS, Executive Order S-3-05 and Governor Brown's Executive Order B-16-2012 (for the transportation sector) require reductions in GHG emissions to 80 percent below 1990 levels by 2050;

WHEREAS, CARB prepared and approved the *First Update to the Climate Change Scoping Plan* (2014 Update);

WHEREAS, the 2014 Update recommended establishing a 2030 mid-term statewide emission reduction target and identified Short-Lived Climate Pollutants (SLCPs) as an important aspect of a comprehensive approach to addressing climate change;

WHEREAS, in April 2015, Governor Edmund G. Brown, Jr. signed Executive Order B-30-15 that established a greenhouse gas emission reduction target of 40 percent below 1990 levels by 2030;

WHEREAS, Governor Brown's Executive Order B-30-15 ordered that CARB update the scoping plan to express the 2030 target in terms of million metric tons of carbon dioxide equivalent;

WHEREAS, the Legislature enacted the Clean Energy and Pollution Reduction Act of 2015 (SB 350, Statutes of 2015, Chapter 547), requiring the State to establish GHG reduction planning targets and implement them through Integrated Resource Planning in the electricity sector as a whole and among individual utilities and other electricity providers (collectively known as load serving entities), and the Final Plan provides important information to inform this process;

WHEREAS, SB 350 codified an increase in the Renewables Portfolio Standard (RPS) to 50 percent and doubled the energy savings required in electricity and natural gas end uses by 2030 as discussed in the Governor's inaugural address;

WHEREAS, the Legislature enacted Senate Bill 32 (SB 32, Statutes of 2016, Chapter 249; Health and Safety Code section 38566), which affirms the importance of addressing climate change by codifying into statute the GHG emissions reductions target of at least 40 percent below 1990 levels by 2030 contained in Governor Brown's Executive Order B-30-15;

WHEREAS, the Legislature enacted Assembly Bill 197 (AB 197, Statutes of 2016, Chapter 250), which declares that continuing to reduce greenhouse gas emissions is critical for protecting all areas of the State, but especially for the State's most disadvantaged communities, as those communities are affected first, and most frequently, by adverse impacts of climate change, including increased frequency of extreme weather events such as drought, heat waves, and flooding;

WHEREAS, AB 197 requires CARB, when adopting rules and regulations to achieve emissions reductions to protect the State's most affected and disadvantaged communities, to consider the social costs of the emissions of GHGs, and prioritize both emission reduction rules and regulations that result in direct emission reductions at large stationary sources of GHG emissions and direct emission reductions from mobile sources; and emission reduction rules and regulations that result in direct emission reductions from sources other than large stationary or mobile sources, while considering cost-effectiveness and technological feasibility, and minimizing leakage;

WHEREAS, AB 197 directs CARB, in the development of each scoping plan, to identify for each emissions reduction measure:

- The range of projected GHG emissions reductions that result from the measure,
- The range of projected air pollution reductions that result from the measure, and
- The cost-effectiveness, including avoided social costs, of the measure.

WHEREAS, the Legislature enacted Senate Bill 1383 (SB 1383, Statutes of 2016, Chapter 395), which requires CARB to develop, adopt, and begin to implement a Short-Lived Climate Pollutant Strategy no later than January 1, 2018, and the Board adopted that Strategy in Resolution 17-9 in March 2017;

WHEREAS, the Legislature enacted Senate Bill 1386 (SB 1386, Wolk, Chapter 545, Statutes of 2016), which declares it the policy of the State that protection and management of natural and working lands is an important strategy in meeting the State's GHG reduction goals, and requires State agencies to consider protection and management of natural and working lands in establishing policies and grant criteria and in making expenditures;

WHEREAS, the Legislature enacted Assembly Bill 398 (AB 398, Statutes of 2017, Chapter 135), which clarifies the use of market-based compliance mechanisms in ensuring that the statewide greenhouse gas emissions are reduced to at least 40 percent below the 1990 level by 2030 and provides direction on program design;

WHEREAS, AB 398 requires that CARB, no later than January 1, 2018, update the scoping plan to achieve greenhouse gas emission reductions equivalent to at least 40 percent below 1990 levels by 2030;

WHEREAS, the Legislature enacted Assembly Bill 617 (AB 617, Statutes of 2017, Chapter 136), which requires CARB, by October 1, 2018, to prepare a statewide strategy to reduce emissions of toxic air contaminants and criteria pollutants in communities affected by a high cumulative exposure burden;

WHEREAS, reducing California's GHG emissions to a scientifically recognized level necessary for climate stabilization will require California to keep building on the framework of the initial Scoping Plan and 2014 Update by continuing to pursue the maximum technologically feasible and cost-effective actions that will steadily drive down greenhouse gas emissions over the coming decades;

WHEREAS, the latest science contributes even stronger evidence that the widespread impacts of climate change are occurring at a faster pace than documented in previous assessments, and that human beings are extremely likely to be the primary contributors to this phenomenon, further underscoring the urgent need to accelerate GHG emission reductions;

WHEREAS, in July and August of 2015, the process for updating the scoping plan process initiated with the Governor's Office Pillar Symposiums for 2030 Climate Change Commitments;

WHEREAS, in October 2015, CARB organized an interagency public kickoff workshop in Sacramento to discuss developing an update to the scoping plan to reflect the 2030 greenhouse gas reduction target (2017 Scoping Plan Update), public process, and overall schedule;

WHEREAS, throughout 2016, CARB organized and co-hosted workshops with other State agencies throughout the State (including in Sacramento, Bay Area, and the Central Valley) to discuss technical and economic analysis, and sector specific issues and recommendations;

WHEREAS, CARB reconvened the Environmental Justice Advisory Committee (EJAC), which met twenty times between December 2015 and November 2017, and the EJAC has provided formal recommendations on developing the 2017 Scoping Plan Update;

WHEREAS, CARB and the EJAC organized nineteen community meetings throughout the State (Sacramento, Bay Area, Southern California, Central Valley) between July 2016 and March 2017 to seek community input on developing the 2017 Scoping Plan Update;

WHEREAS, Governor Brown issued a directive to the Office of Environmental Health Hazard Assessment (OEHHA) to prepare a report analyzing the benefits and impacts of the greenhouse gas emissions limits adopted by CARB within disadvantaged communities and update this report at least every three years;

WHEREAS, in preparing the 2017 Scoping Plan Update, CARB staff collaborated with the Climate Action Team and solicited input and expertise from a range of state agencies to identify and describe a long-term vision and near-term activities to put California on the path to its 2050 emission reduction goal in key areas comprising major components of the State's economy: Energy; Industry; Transportation; Natural and Working Lands; Agriculture; Waste Management; and Water;

WHEREAS, in preparing the 2017 Scoping Plan Update, CARB staff considered advice and input from the Environmental Justice Advisory Committee, economic advisors, experts in the field of climate change, public stakeholders, and regulated entities;

WHEREAS, in June 2016, CARB staff prepared and circulated for public review a *2030 Target Scoping Plan Update Concept Paper* (Concept Paper) and provided an informational update to the Board on the Concept Paper at the June 23, 2016 Board meeting;

WHEREAS, in December 2016, CARB staff prepared and circulated for public review the *Discussion Draft: 2030 Target Scoping Plan Update* (Discussion Draft), and held a public workshop in Sacramento on December 16, 2016 on the Discussion Draft;

WHEREAS, on January 20, 2017, after considering public comment received on the Discussion Draft, CARB staff prepared, in consultation with State agencies and after considering advice and input from the Environmental Justice Advisory Committee, and circulated for public review *The 2017 Climate Change Scoping Plan Update: The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target* (Proposed Plan);

WHEREAS, on January 27, 2017 and February 16, 2017, CARB staff provided updates on the Proposed Plan to the Board in Sacramento, and the Board provided direction to CARB staff to conduct additional analyses and requested an opportunity to have a joint meeting with the EJAC members;

WHEREAS, the Board held joint meetings with the EJAC members on February 15, 2017 and April 26, 2017 to discuss the Scoping Plan, the EJAC recommendations on the Scoping Plan, and options for addressing the recommendations;

WHEREAS, on November 30, 2017, after considering public comment received at the Board Hearings, incorporating direction from the Board, and incorporating Legislative direction in AB 398, CARB staff prepared and circulated for public review California's 2017 Climate Change Scoping Plan: *The Strategy for Achieving California's 2030 Greenhouse Gas Target* (Final Plan);

WHEREAS, CARB staff coordinated extensively with agencies throughout California government, as well as consulting with stakeholders, academic experts in relevant topics, representatives and expert analysts associated with affected industries, non-governmental organizations, representatives and expert analysts associated with affected communities, and many other members of the public;

WHEREAS, the Final Plan finds that California is on track to meet the near-term 2020 greenhouse gas limit and is well positioned to maintain and continue reductions beyond 2020 as required by AB 32;

WHEREAS, the Final Plan establishes the mid-term statewide emission reduction target of 260 MMTCO<sub>2</sub>e as required by SB 32 and the target serves as a milestone on the

path to the deeper GHG reductions needed to avoid the most catastrophic impacts of climate change;

WHEREAS, the Final Plan frames the suite of policy measures, regulations, planning efforts, and investments in clean technologies needed to continue driving down emissions and ensure that the State stays on course to meet its long-term reduction objectives;

WHEREAS, the Final Plan makes recommendations on the creation of new policies, and expanding and refining existing policies, in the major economic sectors in the State to achieve reductions in greenhouse gas emissions, including transportation which is the largest sector of GHG emissions;

WHEREAS, to meet the State's 2030 and long-range greenhouse gas emissions reductions goals, the Scoping Plan identifies the need to reduce statewide vehicle miles travelled using a combination of local, regional, and statewide strategies by 7 percent by 2035 and 15 percent by 2050 from business as usual forecasts;

WHEREAS, the Final Plan finds that cumulative greenhouse gas emissions drive climate change and a continuum of action is needed to reduce emissions to achieve SB 32's mid-term target and AB 32's long-term objective of reducing California's greenhouse gas emissions to the scientifically recognized level necessary for climate stabilization;

WHEREAS, in consideration of the Final Plan, written and oral testimony presented by the public, industry, and government agencies, the Board finds that:

The GHG mid-term target for the year 2030 is 260 MMTCO<sub>2</sub>e;

The creation of new policies and expanding and refining existing policies in every major economic sector in the State will be necessary both to maintain and continue reduction in emissions of GHGs beyond 2020, and to achieve the 2030 emission reduction goals;

Decreasing emissions of short lived climate pollutants is necessary to slow the near-term rate of global warming, especially in areas most vulnerable to climate change;

Implementation of the Final Plan will reduce demand for onroad transportation fuels by about 45 percent by 2030.

Avoiding GHG emissions from and increasing carbon sequestration in natural and working lands is crucial in the State's long-term climate change strategy;

California's local and regional governments are critical partners in meeting the State's GHG emission reduction goals and strong collaboration with these agencies will be necessary to achieve the State's near-term, mid-term, and

longer-term emission goals and improve its ability to adapt to potential climate change impacts;

Recommended measures have been prioritized, where possible, to offer co-benefits, including via reducing other air pollutants that impact community health and benefit disadvantaged communities and leverages several policies whose primary purpose is to improve air quality;

The Final Plan prioritizes rules and regulations for direct GHG reductions, and includes policies to require direct GHG reductions at some of the State's largest stationary sources and mobile sources in a manner consistent with AB 197;

The Final Plan considers protection against emissions leakage; supports the development of integrated and cost-effective regional, national, and international GHG reduction programs; continues to fund programs for disadvantaged communities and local transit projects through the Greenhouse Gas Reduction Fund; provides compliance flexibility; and support the Clean Power Plan and federal climate programs;

CARB has begun the process to implement the provisions of AB 197, including incorporating GHG and criteria pollutant data into a visualization tool in December 2016, and implementation of AB 617 will provide for more uniform and timely data across the State to be added in subsequent years;

There is a need for more community based reductions from programs that target criteria and toxic pollutants to protect the health of residents in overly burdened communities – with AB 617 being a critical part of the State's plan for addressing impacted communities;

AB 617 will complement traditional air quality programs that have focused on improving regional air quality as well as climate change measures reflected in the Scoping Plan by targeting the State's most burdened communities for further criteria and air toxics emission reductions with the goal of reducing exposures and improving public health;

WHEREAS, CARB's regulatory program that involves the adoption, approval, amendment, or repeal of standards, rules, regulations, or plans has been certified by the Secretary of Natural Resources Agency under Public Resources Code section 21080.5 of the California Environmental Quality Act (CEQA; California Code of Regulations, title 14, section 15251(d)), and CARB conducts its CEQA review according to this certified program (California Code of Regulations, title 17, sections 60000-60007);

WHEREAS, CARB prepared a draft environmental analysis under its certified regulatory program for the Final Plan entitled *Draft Environmental Analysis for The Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target* (Draft EA), and circulated it as Appendix F to the Final Plan for 80 days from January 20, 2017, through April 10, 2017;

WHEREAS, the Draft EA concluded that implementation of the Final Plan has the potential to result in: beneficial impacts to air quality, energy demand and greenhouse gas emissions; less than significant impacts, or no impacts, to energy demand, resources related to land use planning, mineral resources, population and housing, public services, and recreational services; and potentially significant and unavoidable impacts to aesthetics, agriculture and forest resources, air quality, biological resources, cultural resources, geology and soils, hazards and hazardous materials, hydrology and water quality, resources related to land use planning, noise, recreational services, transportation/traffic, and utilities and service systems;

WHEREAS, CARB staff reviewed written comments received on the Draft EA and prepared the *Final Environmental Analysis Prepared for the Strategy for Achieving California's 2030 Greenhouse Gas Target* (Final EA) and prepared written response to comments received on the Draft EA in a document entitled *Response to Comments on the Draft Environmental Analysis prepared for the Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target* (Response to EA Comments);

WHEREAS, on November 30, 2017, CARB staff posted on CARB's webpage the Final EA as Appendix F to the Final Plan;

WHEREAS, on December 1, 2017, CARB staff posted on CARB's webpage the Response to EA Comments;

WHEREAS, staff reviewed additional written comments received on the *Environmental Analysis* and prepared written responses to those comments in a document entitled *Supplemental Responses to Comments on the Environmental Analysis Prepared for the Proposed Strategy for Achieving California's 2030 Greenhouse Gas Target* (Supplemental Responses to Environmental Comments);

WHEREAS, on December 14, 2017, CARB staff released the Supplemental Responses to Environmental Comments; and

WHEREAS, prior to the duly noticed public hearing held on December 14, 2017, CARB staff provided the Final EA, Response to EA Comments, Supplemental Response to EA Comments and the Final Plan to the Board for consideration.

NOW, THEREFORE, BE IT RESOLVED that the Board certifies that the Final EA, as set forth in Attachment B to this resolution, was completed in compliance with CARB's certified regulatory program to meet the requirements of CEQA, reflects the agency's independent judgment and analysis, and was presented to the Board whose members reviewed and considered the information therein before taking action to approve the Final Plan.

BE IT FURTHER RESOLVED that the Board hereby approves the Responses to EA Comments and the Supplemental Responses to EA Comments as set forth in Attachment C to this resolution.



BE IT FURTHER RESOLVED that in consideration of the Final EA, the Responses to EA Comments and the Supplemental Responses to EA Comments, the Board adopts the Findings and Statement of Overriding Considerations as set forth in Attachment D to this resolution.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to transmit the Notice of Decision to the Secretary of the Natural Resources Agency for posting.

BE IT FURTHER RESOLVED that the Board hereby approves the Final Plan, as set forth in Attachment A to this resolution.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to amend the Cap-and-Trade Regulation to reflect the direction in AB 398 through a public process in conformance with the requirements of the Administrative Procedure Act and evaluate, within that process, any potential impacts from changes to design features, including assessments of the quantity of allowances available at auction, the price containment points, and the price ceiling to ensure a sufficient carbon price to incentivize GHG reductions by December 31, 2018.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to work with the metropolitan transportation organizations to develop proposed 2035 targets that in combination with statewide, regional, and local strategies enable the state to meet the Scoping Plan 2030 greenhouse gas reduction target.

BE IT FURTHER RESOLVED that the Board hereby adopts the goal of sequestering and avoiding at least 15-20 MMTCO<sub>2</sub>e by 2030 in the natural and working lands sector.

BE IT FURTHER RESOLVED that the Board directs the Executive Officer to work with the California Natural Resources Agency (CNRA), California Department of Food and Agriculture (CDFA), and California Environmental Protection Agency (CalEPA) and other agencies to reevaluate the 2030 quantitative goal identified for the natural and working lands sector in the 2017 Climate Change Scoping Plan by no later than September 30, 2018 and determine if the goal should be adjusted in light of ongoing analyses to estimate the GHG mitigation potential of this sector. This reevaluation must be conducted with a public process and include the identification of actions to meet a revised goal. In setting a revised goal for this sector, the Board directs the Executive Officer to consider the relative contribution to GHG emissions and carbon sequestration of each land type, the available options for land management to reduce GHG emissions and increase carbon sequestration, and the relative cost and effectiveness of the available land management options. The Executive Officer will report to the Board on its reconsideration of the goal and any adjustments made to it as part of the annual update on the implementation of the Scoping Plan.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to establish a carbon accounting framework for natural and working lands as described in SB 859 by 2018.

BE IT FURTHER RESOLVED that the Board directs the Executive Officer to work with the CNRA, CDFA, CalEPA and other agencies to complete the Natural and Working Lands (NWL) Climate Change Implementation Plan no later than November 30, 2018.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to evaluate and propose a Low Carbon Fuel Standard to reflect an increased carbon intensity reduction by 2030.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to work with CDPH, OEHHA, and other state agencies to establish a timeline and an action plan to better integrate health analysis broadly into the design and implementation of the State's climate change programs with the goal of maximizing health benefits.

BE IT FURTHER RESOLVED that the Board hereby determines that the Final Plan should inform the preliminary 2030 GHG planning target range for the electricity sector, which, in coordination with the California Public Utilities Commission and the California Energy Commission, will be evaluated and revised, as appropriate, as part of the Board's process to establish GHG planning targets for the electricity sector and each load-serving entity for use in Integrated Resource Plans pursuant to SB 350.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to collaborate with other State agencies to implement the Short-Lived Climate Pollutant Strategy, consistent with Resolution 17-9, beginning no later than January 1, 2018.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to evaluate and propose updated SB 375 targets for the State's Metropolitan Planning Organizations.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to develop and explore an inclusive interagency policy development process to evaluate and identify implementation pathways for additional policies to reduce VMT, and promote sustainable communities.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to collaborate with other State agencies in implementing the Mobile Source Strategy (Cleaner Technology and Fuels).

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to collaborate with other State agencies in implementing the California Sustainable Freight Action Plan.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to identify opportunities to expand funding and financing mechanisms to support GHG reductions across all sectors.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to collaborate with CEC and CPUC to evaluate and pursue strategies to increase

electrification in the building sector where demonstrated to reduce GHGs and to align CARB's programs to support broader electrification across sectors where demonstrated to reduce GHGs.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to continue to evaluate and explore opportunities to achieve significant cuts in greenhouse gas emissions from all sources, including supply-side opportunities to reduce production of energy sources, that contribute to climate change, air pollution, and other environmental and health hazards. The Executive Officer will update the Board by December 31, 2018 and annually thereafter, and pursue measures that are cost-effective and technologically feasible.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to continue to work with stakeholders to develop and make available additional air emissions data reports in the emissions inventory mapping tool to allow for the evaluation of air emissions trends by sector by census tracts and to make the first reports available by September, 2018, and annually thereafter.


BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to continue to collaborate with OEHHA as they develop updated reports on the benefits and impacts of the greenhouse gas-emissions limits adopted by CARB within disadvantaged communities.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to design and integrate robust enforcement mechanisms as individual Scoping Plan measures are drafted into regulations and plans.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer to identify and post on the Board's website the GHG, criteria pollutants, air toxics, and programmatic metrics for transportation programs.

BE IT FURTHER RESOLVED that the Board hereby directs the Executive Officer provide an annual report to the Board on the environmental performance and implementation of the Scoping Plan and the progress toward achieving the State's GHG targets.

I hereby certify that the above is a true and correct copy of Resolution 17-46 as adopted by the California Air Resources Board.

  
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Rana McReynolds, Clerk of the Board

Resolution 17-46

December 14, 2017

**Identification of Attachments to the Board Resolution**

**Attachment A:** The 2017 Climate Change Scoping Plan: The Strategy For Achieving California's 2030 Greenhouse Gas Target, released to the public on November 30, 2017.

**Attachment B:** *Final Environmental Analysis Prepared for The 2017 Climate Change Scoping Plan: The Strategy For Achieving California's 2030 Greenhouse Gas Target*, released to the public on November 30, 2017.

**Attachment C:** Responses to Comments on the Draft Environmental Analysis for *The 2017 Climate Change Scoping Plan: The Strategy For Achieving California's 2030 Greenhouse Gas Target*, released to the public December 1, 2017, and Supplemental Responses to Comments on the Environmental Analysis for *The 2017 Climate Change Scoping Plan: The Strategy For Achieving California's 2030 Greenhouse Gas Target*, released to the public on December 14, 2017 and provided to the Board

**Attachment D:** Findings and Statement of Overriding Considerations